

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

VICTOR SMITH,

Plaintiff,

v.

**EURO-PRO OPERATING, L.L.C.,
EURO-PRO MANAGEMENT COMPANY
CORP. and STANRO-EP CORP.,**

Defendants.

CASE NO: 3:05 CV 1186

DEFENDANT'S VERIFIED BILL OF COSTS

COMES NOW counsel for Euro Pro Management Services, Inc. ("Defendant"), and answers that the matters contained herein are true and correct.

1. On March 7, 2007, this Court entered Judgment in favor of Defendant as to all Counts of the Plaintiff's Complaint and taxed costs against Plaintiff.

2. Defendant incurred the following costs for deposition transcripts, copies of transcripts and court reporter fees in this matter:

Victor Smith deposition	\$ 717.60
Ralph Hudnall deposition	<u>\$ 404.35</u>
Total	\$1,121.95

3. The depositions taken and deposition transcripts purchased by Defendant in this matter were necessary to Defendant's defense, and the transcripts were relied upon by Defendant in support of its Motion for Summary Judgment.

4. Defendant incurred the following costs for copies in this matter:

Third-Party Duplicating Costs (subpoenaed documents, etc.) \$ 99.70

Maynard, Cooper & Gale Internal Copies \$ 297.70

Grand Total = \$ 397.40

5. The above-described copies were necessary to Defendant's defense, and many of the copies relate to Defendant's Motion for Summary Judgment and supporting briefs.

6. Attached hereto as Exhibit A are true and correct copies of the invoices for these costs.

Accordingly, Defendant respectfully requests that the Court award costs to Defendant Euro Pro Management Services, Inc. in the amount of \$1,539.35.

Respectfully submitted by,

/s/ Warren B. Lightfoot, Jr.

Warren B. Lightfoot, Jr.
Attorney for Defendant
Euro-Pro Management Services, Inc.

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.
2400 AmSouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, Alabama 35203-2618
Telephone: 205.254.1000
Facsimile: 205.254.1999
Email: wlightfoot@maynardcooper.com

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March, 2007, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

John I Cottle, III
Bowles & Cottle
2 South Dubois Avenue
P.O. Box 780397
Tallasse, AL 36078

/s/ Warren B. Lightfoot, Jr.

OF COUNSEL

EXHIBIT A

FREEDOM REPORTING, INC.

367 Valley Avenue
Birmingham, AL 35209
205-397-2397
Tax ID Number: 20-2776665

Warren B Lightfoot, Jr
Maynard, Cooper & Gale
2400 Amsouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, AL 35203

June 2, 2006

Invoice# 00012364

Balance: \$717.60

Re: Victor Smith vs Euro-Pro Operating, LLC, et al
Tallassee, AL / 3:05-CV-1186
on 05/24/06 by Angela Smith McGalliard

Invoicing Information

<u>Charge Description</u>	<u>Amount</u>
Per Diem: 1	120.00
Original: 188 pages	573.40
Exhibits/B & W: 12	4.20
Condensed/concordance	10.00
Ascii	10.00

Witness:
Victor Smith

P l e a s e R e m i t - - - > Total Due: \$717.60

WE APPRECIATE YOU!

FREEDOM REPORTING, INC.

367 Valley Avenue
Birmingham, AL 35209
205-397-2397 Fax: 205-397-2398
Tax ID Number: 20-2776665

Warren B Lightfoot, Jr
Maynard, Cooper & Gale
2400 Amsouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, AL 35203

November 10, 2006

Invoice# 00019414

Balance: \$404.35

Re: Victor Smith vs. Euro-Pro Management Services, Inc.
TALLASSEE/3:05-CV-1186-MEF
on 10/04/06 by Jackie Parham

Invoicing Information

<u>Charge Description</u>	<u>Amount</u>
Copy: 181 pages	371.05
Exhibits/B & W: 38 pages	13.30
Condensed/concordance(s):	10.00
Ascii:	10.00

Deponent:

Ralph Hudnall - Read and Sign

- * Copy and exhibits sent by reporter via mail
- * Read and Sign included with transcripts

P l e a s e R e m i t - - - > Total Due: \$404.35

All Invoices are due within 30 days of receipt

MAYNARD COOPER
& GALE PC
ATTORNEYS AT LAW

Leah V. Burrus, Paralegal
DIRECT 205.488.3599
EMAIL lburrus@maynardcooper.com

July 25, 2006

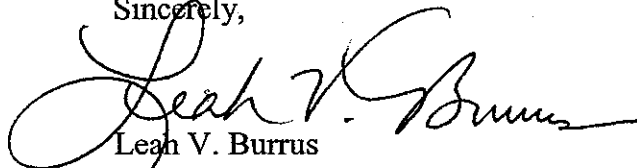
Attn: Kay Lindsey
Equal Employment Opportunity Commission
Birmingham District Office
1130 22nd Street South, Suite 2000
Birmingham, Al 35205-1130

**RE: Euro-Pro Operating, L.L.C., Euro-Pro Management Co. Corp. and
Stanro-EP Corp., Respondent
Victor D. Smith, Charging Party
Charge No.: 130-2005-00853**

Dear Ms. Lindsey:

Enclosed please find a check in the amount of \$14.70 made payable to Pete's Print & Copy for the copy of Mr. Smith's investigative file. Thank you for your assistance in this matter.

Sincerely,


Leah V. Burrus
Paralegal

/lvb
Enclosure

cc: Warren B. Lightfoot, Jr., Esq.

1069874 1062000019 01323776

Accounting Center 2421 North Glassell Street, Orange, CA 92865
714 921 8003

VOLT

www.volt.com workforce

Date: 06-23-06

From: Kate Ray - Employment Verifications

To: Reah V Burrows

Phone: 714-921-8003 (ext. 8922)

Company: Maynard Cooper & Hale

Fax: 205-254-1999

Re: Victor D. Smith

Pages: 1

Urgent ☐ For Review ☒ Please Comment ☐ Please Reply ☐ Please recycle ☐

To Whom It May Concern:

We have received an inquiry from your organization requesting employment and/or wage verification for the above mentioned Volt employee. To provide this request there will be a service charge of \$15.00 made payable to Volt Management Corporation. Please be sure to put the employee name and SSN on the check. You can mail it to the address listed below. Thank you in advance for your cooperation in this matter.

Attn: Kate - Employment Verifications
Volt Management Corporation
PO Box 13500
Orange, CA 92857

Thank you,
Kate Ray
Employment Verification Clerk

AL Dept of Ind Relations APA FY 2004
649 Monroe Street
Montgomery, AL 36131
USA

Invoice

Invoice Number:
2006060224

Invoice Date:
Jun 28, 2006

Page:
1

Voice: (334) 242-8438
Fax: (334) 242-8299

Duplicate

Sold To:

L V Burrus
Constangy, Brooks & Smith
1901 Sixth Ave N STE 1410
Birmingham, AL 35203

Remit to:

Department of Industrial Relations
Finance Division
Attn: Central Cashier
649 Monroe Street, Room 2684
Montgomery, AL 36131
EIN # 63-6000619

Customer ID		Customer PO		Payment Terms	
L V Burrus				Prepaid	
Sales Rep ID		Shipping Method		Ship Date	
		Airborne		6/28/06	

Quantity	Item	Description	Unit Price	Extension
1.00	Research/Retrieval/C	Victor Smith 419-04-5769	70.00	70.00

Check/Credit Memo No:

Subtotal	70.00
Sales Tax	
Total Invoice Amount	70.00
Payment/Credit Applied	
TOTAL	70.00

Direct Invoice/Billing questions to:
Tamaya Knox (334) 242-8438
Direct Product/Service questions to:
Trish Till (334) 242-8081

CostCode	WorkPeriod	Worked Amount	Billed Amount	Description
1	1206	1199.12	1199.12	Computer research
Subtotal 1		1199.12	1199.12	Computer research
103	1006	11.53	11.53	Meals and entertainment
Subtotal 103		11.53	11.53	Meals and entertainment
27	0106	4.29	4.29	Long distance telephone
27	0107	.42	.42	Long distance telephone
27	0206	5.05	5.05	Long distance telephone
27	0207	1.56	1.56	Long distance telephone
27	0306	3.27	3.27	Long distance telephone
27	0307	.78	.78	Long distance telephone
27	0506	3.11	3.11	Long distance telephone
27	0606	16.76	16.76	Long distance telephone
27	0706	1.83	1.83	Long distance telephone
27	0806	30.51	30.51	Long distance telephone
27	0906	.63	.63	Long distance telephone
27	1006	.42	.42	Long distance telephone
27	1106	8.13	8.13	Long distance telephone
27	1206	.99	.99	Long distance telephone
Subtotal 27		77.75	77.75	Long distance telephone
3	0606	15.00	15.00	Duplicating (outside)
3	0706	14.70	14.70	Duplicating (outside)
3	0806	70.00	70.00	Duplicating (outside)
Subtotal 3		99.70	99.70	Duplicating (outside)
38	1206	.32	.32	Communications expense
Subtotal 38		.32	.32	Communications expense
4	0906	11.04	11.04	Express delivery
Subtotal 4		11.04	11.04	Express delivery
47	0207	5.30	5.30	Document Scan to File
47	0306	1.60	1.60	Document Scan to File
47	0307	1.80	1.80	Document Scan to File
47	1106	17.90	17.90	Document Scan to File
47	1206	5.30	5.30	Document Scan to File
Subtotal 47		31.90	31.90	Document Scan to File
50	0306	19.63	19.63	Copy Charges
50	0506	72.93	72.93	Copy Charges
50	0606	34.06	34.06	Copy Charges
50	0706	.65	.65	Copy Charges
50	0806	33.02	33.02	Copy Charges
50	0906	1.82	1.82	Copy Charges
50	1006	1.56	1.56	Copy Charges
50	1106	134.03	134.03	Copy Charges
Subtotal 50		297.70	297.70	Copy Charges
51	0506	7.00	7.00	Fax Charges
51	1006	7.00	7.00	Fax Charges
Subtotal 51		14.00	14.00	Fax Charges
8	0207	85.36	85.36	Mileage
8	0306	97.90	97.90	Mileage
8	0506	107.69	107.69	Mileage
8	0906	98.34	98.34	Mileage
8	1006	52.96	52.96	Mileage
8	1206	78.32	78.32	Mileage
Subtotal 8		520.57	520.57	Mileage